

FILED

September 7, 2022

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
By: SAJ Deputy

Case No: SA:22-CR-00461-JKP**UNITED STATES OF AMERICA,****Plaintiff,****v.****ALEJANDRO RICHARD VELASQUEZ GOMEZ****Defendant.****INDICTMENT****COUNT 1:** 18 U.S.C. § 875(c) Interstate Threatening Communication**COUNT 2:** 18 U.S.C. § 2252A(a)(5)(b) Possession of Child Pornography**Government's Notice of Forfeiture****THE GRAND JURY CHARGES:****COUNT ONE**

[18 U.S.C. § 875(c)]

On or about July 18, 2022, in the Western District of Texas and elsewhere, the defendant,

ALEJANDRO RICHARD VELASQUEZ GOMEZ,

did knowingly transmit in interstate commerce from the State of Texas to the State of Florida and elsewhere, a communication, specifically, an Instagram post publicly accessible, including by the organizers of a student conference to be held in Tampa, Florida on or about July 22, 2022, and the communication contained a threat to injure people attending said conference, specifically, the threat included:

“Hi LatinoZoomer here. July 22 is the day of retribution the day I will have revenge against all of humanity which all of you will pay for my suffering.

SAS will be the turning point of the LatinoZoomer lore.”

All in violation of Title 18 United States Code Section 875(c).

COUNT TWO
[18 U.S.C. § 2252A(a)(5)(B)]

On or about July 22, 2022, within the Western District of Texas, the Defendant,

ALEJANDRO RICHARD VELASQUEZ GOMEZ,

did knowingly possess material, specifically an Apple iPhone XR cellular phone, that contained an image of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), involving a prepubescent minor and a minor who had not attained 12 years of age, such image having been shipped and transported using any means and facility of interstate and foreign commerce, and was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce, including by computer, all in violation of Title 18, United States Code, Section 2252A(a)(5)(B).

NOTICE OF UNITED STATES OF AMERICA'S DEMAND FOR FORFEITURE
[See Fed. R. Crim. P. 32.2]

Sexual Exploitation of Children Violations and Forfeiture Statutes

As a result of the foregoing criminal violation set forth above, the United States of America gives notice to Defendant, **ALEJANDRO RICHARD VELASQUEZ GOMEZ**, of its intent to seek the forfeiture of certain property subject to forfeiture, including but not limited to the digital and electronic devices seized by law enforcement during the investigation of this case and any and all online accounts used to facilitate the offenses, upon conviction and pursuant to Fed. R. Crim. P. 32.2 and Title 18 U.S.C. §§ 2253(a)(1), (2), and (3), which states:

Title 18 U.S.C. § 2253. Criminal forfeiture

(a) Property subject to criminal forfeiture.-A person who is convicted of an offense under this chapter involving a visual depiction described in section 2251, 2251A, 2252, 2252A, or 2260 of this chapter or who is convicted of an offense under section 2251B of this chapter, or who is convicted of an offense under chapter 109A, shall forfeit to the United States such person's interest in-


- (1) any visual depiction described in section 2251, 2251A, 2252, 2252A, or 2260 of this chapter, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of this chapter;
- (2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and
- (3) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

A TRUE BILL

FOREPERSON OF THE GRAND JURY

ASHLEY C. HOFF
UNITED STATES ATTORNEY

BY:


For William F. Lewis, Jr.
Assistant United States Attorney


For Kelly Stephenson
Assistant United States Attorney